

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GERMAN RAMIREZ,

Claimant,

v.

UNITED STATES OF AMERICA,

Defendant.

No. 23 CV 4791

Judge Andrea R. Wood

**JOINT INITIAL STATUS REPORT AND MOTION TO CONTINUE STATUS HEARING**

As stated below, the parties request that the status hearing currently set for December 19, 2023 at 10:15 a.m. be continued for approximately 90 days.

**1. Nature of the Case**

- A. Attorneys of record and lead trial attorneys: (i) Edward David Johnson III for the claimant, Law Office of Edward Johnson, 1945 S. Halsted St., Pilsen East Center, Ste 309, Chicago, IL 60608, 708-606-4386; and (ii) G. David Rojas for the United States of America, Assistant United States Attorney, U.S. Attorney's Office, Northern District of Illinois, 219 S. Dearborn Street, Rm. 500, Chicago, IL 60604, 312-886-5966.
- B. There are no parties who have not yet been served.
- C. The claimant alleges this Court has federal jurisdiction pursuant to Rule 41(g) of the Federal Rules of Criminal Procedure.
- D. The claimant's motion alleges that on November 3, 2021, approximately \$101,980.25 in cash was seized by the Federal Bureau of Investigation in Berwyn, Illinois, and that the claimant is entitled to the return of the property. The matter is pending ongoing resolution discussions.
- E. The United States of America opposes an order requiring it to return property or initiate judicial forfeiture proceedings.
- F. The claimant seeks relief in the form of an order requiring the United States of America to return property or initiate judicial forfeiture proceedings.

## 2. Case Plan

- A. The complaint is a pending motion for return of seized property. The parties request a stay of 90 days on briefing on the motion, as the matter is pending ongoing resolution discussions.
- B. It is unknown at this time whether the United States of America will respond to the complaint by motion, as the matter is pending ongoing resolution discussions.
- C. The parties request a stay of 90 days prior to submitting a proposed discovery plan, as the matter is pending ongoing resolution discussions. Accordingly, the parties request to continue the status hearing currently set for December 19, 2023 at 10:15 a.m. for approximately 90 days.
- D. The claimant has filed a jury demand. The length of the trial is unknown at this time.

## 3. Settlement

- A. The parties have engaged and continue to be engaged in settlement discussions.
- B. The parties do not believe that a settlement conference would be productive at this time.

## 4. Consent to Proceed Before a Magistrate Judge

- A. The parties do not consent to proceed before a United States Magistrate Judge at this time.

Respectfully submitted,

GERMAN RAMIREZ  
Claimant

MORRIS PASQUAL  
Acting United States Attorney

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